

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JUANA DOE I et al,

*Plaintiffs,*

v.

IFC ASSET MANAGEMENT COMPANY,  
LLC,

INTERNATIONAL FINANCE  
CORPORATION,

*Defendants.*

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O.P.D. (Pro Bono; cooperating attorney  
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Dated: May 30, 2018

Civil Action No. 17-1494-JFB-SRF

**FILED UNDER SEAL**

**PLAINTIFFS' UNOPPOSED MOTION  
TO FILE FIRST AMENDED  
COMPLAINT UNDER SEAL**

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**PLAINTIFFS' UNOPPOSED MOTION TO FILE FIRST AMENDED  
COMPLAINT UNDER SEAL**

Plaintiffs hereby move to have Plaintiffs' First Amended Complaint (FAC), D.I. 38, removed from the public docket and filed under seal, and to replace D.I. 38 in the public record with the attached, redacted version of the First Amended Complaint. Defendants have indicated that they do not object.

A horizontal bar chart consisting of five black bars of varying lengths. The first bar is the longest, extending from the left edge to approximately two-thirds of the way across the chart area. The second bar is shorter, ending at approximately one-third of the way across. The third bar is also short, ending at approximately one-quarter of the way across. The fourth bar is very short, ending at approximately one-fifth of the way across. The fifth bar is the shortest, ending at approximately one-tenth of the way across.

## 1. Background.

Term	Percentage
GMOs	~85%
Organic	~80%
Natural	~75%
Artificial	~65%
Organic	~60%
Natural	~55%
Artificial	~50%
Organic	~45%
Natural	~40%
Artificial	~35%

**2. Filing under seal is justified.**

[REDACTED]

Courts have regularly held that filing information under seal is permitted when there are safety concerns for the plaintiff or others. *See Rossbach v. Rundle*, 128 F. Supp. 2d 1348, 1350 (S.D. Fla. 2000) (sealing discovery motions to prevent subjecting non-parties to unwanted publicity); *Yaman v. United States Dep't of State*, 786 F. Supp. 2d 148, 154 (D.D.C. 2011) (plaintiff permitted to file her address under seal because of her interest in protecting her minor daughters); *Doe v. City of San Diego*, 2014 U.S. Dist. LEXIS 66535, \*18 (S.D. Cal. May 14, 2014) (plaintiff permitted to keep her identifying information confidential).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**3. Relief requested.**

For these reasons, Plaintiffs respectfully request leave to have the unredacted FAC, D.I. 38, filed under seal. The sealing would remain for the remainder of this litigation. Upon the termination of the litigation, Plaintiffs request that the document be destroyed.

Plaintiffs respectfully request leave to substitute D.I. 38 with a redacted version, filed hereto as Exhibit 1.

Dated: May 30, 2018

Respectfully submitted,

/s/ Misty A. Seemans

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*Counsel for Plaintiffs*

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<sup>2</sup> Based in CT; admitted in NY; does not practice in DC's courts.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document is being served this day by email on the following counsel of record for Defendants:

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May 30, 2018

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